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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re Navidea Biopharmaceuticals Litigation

Case No.: 1:19-cv-01578-VEC

Gregory Zimmer , hereby declares under penalty of perjury as follows:

1. I am an attorney admitted to practice before this Court and counsel to Defendant/Counterclaim Plaintiff/Third-Party Plaintiff Dr. Michael M. Goldberg, M.D. (“Dr. Goldberg”) in this action. I make this declaration in support of Dr. Goldberg’s motion (the “Motion”) to strike certain opinions of purported expert witness William F. Murray (“Murray”) proffered by Plaintiff/Counterclaim Defendant Navidea Biopharmaceuticals, Inc. (“Navidea”) in this action.

2. Annexed hereto as Exhibit A is a true and correct copy of the Expert Rebuttal Report of Willaim F. Murray, served by Navidea in this action.

3. Annexed hereto as Exhibit B is a true and correct copy of the transcript of the deposition of William F. Murray conducted in this action on December 6, 2021.

Wherefore, I respectfully request that the Court grant Dr. Goldberg’s Motion in its entirety, and award Dr. Goldberg such other and further relief as the Court deems just and proper.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my personal knowledge and investigation or, where noted, on information and belief.

February 4, 2022

/s/ Gregory Zimmer

Gregory Zimmer, Esq.